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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

DOUG GREISEN, an individual,

PLAINTIFF,

v.

JON HANKEN, an individual, **JOHN
DOES 1-5**, and **CITY OF SCAPPOOSE**,
an Oregon municipality,

DEFENDANTS.

Case No. 3:14-cv-01399-SI

**PLAINTIFF'S ITEMIZED LIST OF
DAMAGES**

Plaintiff seeks compensatory damages as follows:

Plaintiff seeks an award of compensatory damages under 42 U.S.C. § 1983. The items of
Compensatory damages are listed below:

1. MONETARY LOSSES

\$352,973 in lost compensation, lost leave time, diminished retirement benefits and excess
health care coverages costs through the date of trial (July 22, 2016).

\$1,482,607 in lost future compensation, retirement benefits and excess health care
coverage costs post-trial (after July 22, 2016).

These amounts will be proven through the testimony of Doug Greisen, Michelle Greisen, Ron Greisen and through Ron Greisen's expert report and the financial documents relied upon.

2. NON-MONETARY HARMS

Plaintiff seeks non-monetary damages for mental and emotional stress, humiliation, embarrassment and damage to reputation in the sum of \$3,000,000. Plaintiff's claims for non-monetary damages will be proven primarily through the testimony of Doug Greisen, Michelle Greisen, Ciara Greisen, Ron Greisen, Jerry Gillham, Barb Hayden and Judi Ingham, and through the media exhibits.

DATED this 10th day of June, 2016.

ELLIOTT, OSTRANDER & PRESTON, P. C.

By: /s/ John D. Ostrander

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Of Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served the attached **PLAINTIFF'S ITEMIZED LIST OF DAMAGES** on:

Karen M Vickers
Mersereau Shannon LLP
1 SW Columbia St Ste 1600
Portland OR 97258
kvickers@mershanlaw.com

- ☐ [] by mailing to said attorney(s) a full and correct copy therefor, contained in a sealed envelope, with postage paid, addressed to said attorney(s) as stated above and deposited in the United States Post Office at Portland, Oregon.
- ☒ [X] by hand delivering to said attorney(s) a true copy thereof.
- ☐ [] by faxing to said attorney(s) a true copy thereof.
- ☐ [] by emailing to said attorney(s) a true copy thereof.
- ☒ [X] by electronic filing with the Court's CM/ECF system. The CM/ECF system generated Notice of Electronic Filing constitutes proof of service upon a Filing User in accordance with Fed. R. Civ. P. 5(d).

Dated this 10th day of June, 2016

ELLIOTT, OSTRANDER & PRESTON, P.C.

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